



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

An attorney from
Coca Cola, E. Irving,
stated that the
ltr. was received
on 2/19/13.

CERTIFIED MAIL
RETURN RECEIPT REQUESTED



SDMS DocID 2183977

FEB 14 2013

Coca Cola Corporation
Bernard Goepelt, Senior Vice President and General Counsel
1 Coca Cola Plaza, N.W.
Atlanta, GA 30313

ORIGINAL

**Re: Required Submission of Information
Lower Darby Creek Area Superfund Site,
Operable Unit 1 - Clearview Landfill
Darby Township, Delaware County and Philadelphia, Pennsylvania**

Dear Mr. Goepelt:

The U.S. Environmental Protection Agency ("EPA") is seeking information related to the release, or threat of release, of hazardous substances, pollutants or contaminants into the environment from Operable Unit 1 of the Lower Darby Creek Site ("Site"). EPA is investigating the source of contamination in the vicinity of the Clearview Landfill, also known as Heller's Dump (collectively, "Clearview"), located at or near 83rd Street and Buist Avenue in Philadelphia, PA and bordering Darby Creek in Darby Township. The Site also includes the Folcroft Landfill and Annex located approximately two miles away in Folcroft Borough, Delaware County. This information request is limited to Clearview. Coca Cola Corporation ("Coca Cola" or "you") was identified by an employee of Patrick Bizzari Hauling, a/k/a Bizzari Waste, who recalled Coca Cola disposing of a tractor trailer full of glass and a syrup-type liquid at Clearview (see Enclosure F). The specific information required is attached to this letter as Enclosure E.

Pursuant to Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. § 9604(e), EPA has the authority to require Coca Cola to furnish all information and documents in its possession, custody, or control, or in the possession, custody, or control of any of its employees or agents, which concern, refer, or relate to hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. § 9601(14), pollutants and/or contaminants as defined by Section 101(33) of CERCLA, 42 U.S.C. § 9601(33), which were transported to, stored, treated, or disposed of at the above-referenced Site.

Please respond in writing to this required submission of information within **thirty (30) calendar days** of your receipt of this letter.

If, for any reason, Coca Cola does not provide all information responsive to this letter, then in its answer to EPA Coca Cola should: (1) describe specifically what was not provided, and (2) provide to EPA an appropriate reason why the information was not provided.

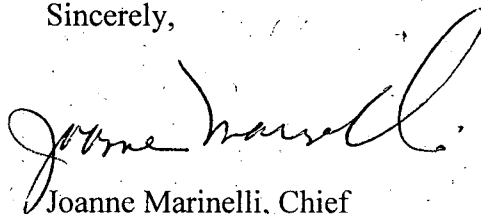
All documents and information should be sent to:

Ms. Maria Goodine (3HS62)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

This required submission of information is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. Section 3501, et seq.

If you have any questions concerning this matter, please contact Compliance Officer Maria Goodine at (215) 814-2488, or have your attorney contact Senior Assistant Regional Counsel Bonnie A. Pugh at (215) 814-2680.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joanne Marinelli".

Joanne Marinelli, Chief
Cost Recovery Branch

Enclosures: A. Business Confidentiality Claims/Disclosure of Your Response to
EPA Contractors and Grantees
B. List of Contractors that May Review Your Response
C. Definitions
D. Instructions
E. Information Requested
F. Interview Summary

cc: Bonnie A. Pugh (3RC42)
Maria Goodine (3HS62)
Joshua Barber (3HS21)
Noreen Wagner (PADEP)

Enclosure A

Business Confidentiality Claims

You are entitled to assert a claim of business confidentiality covering any part or all of the submitted information, in the manner described in 40 C.F.R. Part 2, Subpart B. Information subject to a claim of business confidentiality will be made available to the public only in accordance with the procedures set forth in 40 C.F.R. Part 2, Subpart B. If a claim of business confidentiality is not asserted when the information is submitted to EPA, EPA may make this information available to the public without further notice to you. You must clearly mark such claimed information by either stamping or using any other such form of notice that such information is a trade secret, proprietary, or company confidential. To best ensure that your intent is clear, we recommend that you mark as confidential each page containing such claimed information.

Disclosure of Your Response to EPA Contractors and Grantees

EPA may contract with one or more independent contracting firms (See "Enclosure B") to review the documentation, including documents which you claim are confidential business information ("CBI"), which you submit in response to this information request, depending on available agency resources. Additionally, EPA may provide access to this information to (an) individual(s) working under (a) cooperative agreement(s) under the Senior Environmental Employee Program ("SEE Enrollees"). The SEE Program was authorized by the Environmental Programs Assistance Act of 1984 (Pub. L. 98-313). The contractor(s) and/or SEE Enrollee(s) will be filing, organizing, analyzing and/or summarizing the information for EPA personnel. The contractors have signed a contract with EPA that contains a confidentiality clause with respect to CBI that they handle for EPA. The SEE Enrollee(s) is working under a cooperative agreement that contains a provision concerning the treatment and safeguarding of CBI. The individual SEE Enrollee has also signed a confidentiality agreement regarding treatment of CBI. Pursuant to Section 104(e)(7) of CERCLA, 42 U.S.C. § 9604(e)(7), and EPA's regulations at 40 C.F.R. § 2.310(h), EPA may share such CBI with EPA's authorized representatives which include contractors and cooperators under the Environmental Programs Assistance Act of 1984. (See 58 Fed.Reg. 7187 (1993)). If you have any objection to disclosure by EPA of documents which you claim are CBI to any or all of the entities listed in Enclosure B, you must notify EPA in writing at the time you submit such documents.

Enclosure B

[rev. 10/2012]

List of Contractors That May Review Your Response

Emergint Technologies, Inc.

Contract # EP-W-11-025

Subcontractor: Booz-Allen & Hamilton

Booz-Allen & Hamilton

Contract # GS-35F-0306J (GSA Schedule)

CDM-Federal Programs Corporation

Contract # EP-S3-07-06

Subcontractors: L. Robert Kimball & Associates Inc.
Avatar Environmental LLC
Terradon Corporation

Chenega Global Services, LLC

Contract #EP-S3-09-02

EA Engineering, Science and Technology, Inc.

Contract #EP-S3-07-07

Subcontractor: URS

Eisenstein Malanchuck, LLP

Contract #EP-W-07-079

Subcontractors: R. M. Fields International, LLC
James C. Hermann & Associated

Hydrogeologic (HGL)

Contract #EP-S3-07-05

Subcontractor: CH2MHill
Sullivan International

Weston Solutions

Contract #EP-S3-1005

Tech Law, Inc.

Contract #EP-S3-1004

Tetra Tech NUS, Inc.

Contract #EP-S3-07-04

Kemron Environmental Services, Inc.

Contract #EP-S3-12-01,

Subcontractor: AECOM Technical Services, Inc.

Guardian Environmental Services Company, Inc.

Contract #EP-S3-12-02,

Subcontractors: Aerotek, Inc.,
Tetra Tech, Inc.

Environmental Restoration, LLC

Contract # EP-S3-12-03

Subcontractors: Aerotek, Inc
Haas Environmental, Inc,
Hertz

WRS Infrastructure & Environment, Inc.

Contract # EP-S3-12-05

Industrial Economics, Inc.

Contract # EP-W-06-092

Cooperative Agreements

National Association of Hispanic Elderly

CA# Q83424401

CA # ARRA 2Q8343730-01

National Older Workers Career Center

CA# Q-835030

Enclosure C

Definitions

1. The term "arrangement" shall mean every separate contract or other agreement or understanding between two or more persons, whether written or oral.
2. The term "documents" shall mean writings, photographs, sound or magnetic records, drawings, or other similar things by which information has been preserved and also includes information preserved in a form which must be translated or deciphered by machine in order to be intelligible to humans. Examples of documents include, but are not limited to, electronic mail and other forms of computer communication, drafts, correspondence, memoranda, notes, diaries, statistics, letters, telegrams, minutes, contracts, reports, studies, checks, statements, receipts, summaries, pamphlets, books, invoices, checks, bills of lading, weight receipts, toll receipts, offers, contracts, agreements, deeds, leases, manifests, licenses, permits, bids, proposals, policies of insurance, logs, inter-office and intra-office communications, notations of any conversations (including, without limitation, telephone calls, meetings, and other communications such as e-mail), bulletins, printed matter, computer printouts, invoices, worksheets, graphic or oral records or representations of any kind (including, without limitation, charts, graphs, microfiche, microfilm, videotapes, recordings and motion pictures), electronic, mechanical, magnetic or electric records or representations of any kind (including, without limitation, tapes, cassettes, discs, recordings and computer memories), minutes of meetings, memoranda, notes, calendar or daily entries, agendas, notices, announcements, maps, manuals, brochures, reports of scientific study or investigation, schedules, price lists, data, sample analyses, and laboratory reports.
3. The term "hazardous substance" means (a) any substance designated pursuant to section 1321(b)(2)(A) of Title 33 of the U.S. Code, (b) any element, compound, mixture, solution, or substance designated pursuant to Section 9602 of CERCLA, (c) any hazardous waste having the characteristics identified under or listed pursuant to Section 3001 of the Solid Waste Disposal Act (42 U.S.C. § 6921) (but not including any waste the regulation of which under the Solid Waste Disposal Act, 42 U.S.C. § 6901 et seq., has been suspended by Act of Congress), (d) any toxic pollutant listed under Section 1317(a) of Title 33, (e) any hazardous air pollutant listed under section 112 of the Clean Air Act, 42 U.S.C. § 7412, and (f) any imminently hazardous chemical substance or mixture with respect to which the Administrator has taken action pursuant to Section 2606 of Title 15 of the U.S. Code. The term does not include petroleum, including crude oil or any fraction thereof which is not otherwise specifically listed or designated as a hazardous substance under subparagraphs (a) through (f) of this paragraph, and the term does not include natural gas, natural gas liquids, liquefied natural gas, or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas).

4. The term "pollutant or contaminant" shall include, but not be limited to, any element, substance, compound, or mixture, including disease-causing agents, which after release into the environment and upon exposure, ingestion, inhalation, or assimilation into any organism, either directly from the environment or indirectly by ingestion through food chains, will or may reasonably be anticipated to cause death, disease, behavioral abnormalities, cancer, genetic mutation, physiological malfunctions (including malfunctions in reproduction) or physical deformations in such organisms or their offspring, except that the term "pollutant or contaminant" shall not include petroleum, including crude oil or any fraction thereof which is not otherwise specifically listed or designated as a hazardous substance under CERCLA, and shall not include natural gas, liquefied natural gas, or synthetic gas of pipeline quality (or mixtures of natural gas and such synthetic gas).
5. The term "release" means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment (including the abandonment or discarding of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant), but excludes (a) any release which results in exposure to persons solely within a workplace, with respect to a claim which such persons may assert against the employer of such persons, (b) emissions from the engine exhaust of a motor vehicle, rolling stock, aircraft, vessel, or pipeline pumping station engine, (c) release of source, byproduct, or special nuclear material from a nuclear incident, as those terms are defined in the Atomic Energy Act of 1954, 42 U.S.C. § 2011 et seq., if such release is subject to requirements with respect to financial protection established by the Nuclear Regulatory Commission under Section 170 of such Act, 42 U.S.C. § 2210, or, for the purposes of Section 9604 of CERCLA or any other response action, any release of source, byproduct, or special nuclear material from any processing site designated under 42 U.S.C. §§ 7912(a)(1) and 7942(a) and (d) the normal application of fertilizer.
6. The term "waste" or "wastes" shall mean and include any discarded materials including, but not limited to, trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, pollutants or contaminants, and discarded or spilled chemicals, whether solid, liquid, or sludge.
7. The term "you" when referring to an incorporated entity shall mean and include the incorporated entity and its agents and representatives, including, but not limited to, persons directly authorized to transact business on the entity's behalf such as officers, directors, or partners with which the entity is affiliated, employees, accountants, engineers, or other persons who conduct business on the entity's behalf, as well as affiliated entities, including, but not limited to, partnerships, limited liability companies, divisions, subsidiaries, and holding companies.

Enclosure D

Instructions

1. You are entitled to assert a claim of business confidentiality covering any part or all of the information you submit. If you desire to assert a claim of business confidentiality, please see Enclosure A, *Business Confidentiality Claims/Disclosure of Your Response to EPA Contractors and Grantees*. You must clearly mark such information by either stamping or using any other form of notice that such information is a trade secret, proprietary, or company confidential. To ensure to the greatest extent that your intent is clear, we recommend that you mark as confidential each page containing such claimed information.
2. Please provide a separate, detailed narrative response to each question, and to each subpart of each question, set forth in this Information Request. If you fail to provide a detailed response, EPA may deem your response to be insufficient and thus a failure to comply with this Information Request, which may subject you to penalties.
3. Precede each response with the number of the question or subpart of the question to which it corresponds. For each document or group of documents produced in response to this Information Request, indicate the number of the specific question or subpart of the question to which the document(s) responds.
4. Should you find at any time after submission of your response that any portion of the submitted information is false, misrepresents the truth or is incomplete, you must notify EPA of this fact and provide EPA with a corrected written response.
5. Any terms that are used in this Information Request and/or its Enclosures that are defined in CERCLA shall have the meaning set forth in CERCLA. Definitions of several such terms are set forth in Enclosure C, *Definitions*, for your convenience. Also, several additional terms not defined in CERCLA are defined in Enclosure C. Those terms shall have the meaning set forth in Enclosure C any time such terms are used in this Information Request and/or its Enclosures.

Enclosure E

Information Required

In the following questions, the terms "Coca Cola," "you," and "your" refer to the Coca Cola Corporation. The term "Philadelphia area" refers to southeastern Pennsylvania and southern New Jersey.

1. What is the current nature of the business or activity conducted by Coca Cola in the Philadelphia area? What is the current address of any Coca Cola facility in the Philadelphia area?
2. What was the nature of your business or activity in the Philadelphia area between 1958 and 1976? Describe in detail.
3. Identify all persons currently or formerly employed by Coca Cola's Philadelphia area facilities who have or may have personal knowledge of your operations and waste disposal practices between 1958 and 1976. For each such person, state that person's job title, dates of employment, current address, and telephone number. If the current telephone number or address is not available, provide the last known telephone number or last known address of such person.
4. Identify every hazardous substance used, generated, purchased, stored, or otherwise handled at your Philadelphia area facilities between 1958 and 1976. With respect to each such hazardous substance, further identify:
 - a. The process(es) in which each hazardous substance was used, generated, purchased, stored, or otherwise handled at Coca Cola's Philadelphia area facilities;
 - b. The chemical composition, characteristics, and physical state (solid, liquid, or gas) of each such hazardous substance;
 - c. The annual quantity of each such hazardous substance used, generated, purchased, stored, or otherwise handled at Coca Cola's Philadelphia area facilities;
 - d. The beginning and ending dates of the period(s) during which such hazardous substance was used, generated, purchased, stored, or otherwise handled at Coca Cola's Philadelphia area facilities;
 - e. The types and sizes of containers in which these substances were transported and stored; and
 - f. The persons or companies that supplied each such hazardous substance to Coca Cola.

5. Identify all by-products and wastes generated, stored, transported, treated, disposed of, released, or otherwise handled at Coca Cola's Philadelphia area facilities between 1958 and 1976. With respect to each such by-product and waste identified, further identify:
- The process(es) in which each such by-product and waste was generated, stored, transported, treated, disposed of, released, or otherwise handled at Coca Cola's Philadelphia area facilities;
 - The chemical composition, characteristics, and physical state (solid, liquid, or gas) of each such by-product or waste;
 - The annual quantity of each such by-product and waste generated, stored, transported, treated, disposed of, released, or otherwise handled at Coca Cola's Philadelphia area facilities;
 - The types, sizes and numbers of containers used to treat, store, or dispose each such by-product or waste;
 - The name of the individual(s) and/or company(ies) that disposed of or treated each such by-product or waste; and
 - The location and method of treatment and/or disposal of each such by-product or waste.
6. Did Coca Cola ever contract with, or make arrangement with any of the following companies: Clearview Land Development Company, the Clearview Landfill, Heller's Dump, Richard or Edward Heller, Eastern Industrial Corporation, Tri-County Hauling, Patrick Bizzari Hauling, "Charles Crumbley," Ace Service Corp./Ace Dump Truck, Edward Lawrenson, Inc., "Quickway," "Nu Way," "Bennie's Hauling," William Adams and Sons, "Al Gonnelli," Schiavo Brothers, Inc., "Maritime," Dorner Trash, Harway, Inc./Warren Harmon, Inc., Northeast Disposal, Donald Vile, Inc., Disposal Corporation of America, "White Glove Trash" or any other company or municipality to remove or transport material from your facilities in the Philadelphia, Pennsylvania area for disposal between 1958 and 1976? If so, for each transaction identified above, please identify:
- The person with whom you made such a contract or arrangement;
 - The date(s) on which or time period during which such material was removed or transported for disposal;
 - The nature of such material, including the chemical content, characteristics, and physical state (i.e., liquid, solid, or gas);
 - The annual quantity (number of loads, gallons, drums) of such material;
 - The manner in which such material was containerized for shipment or disposal;
 - The location to which such material was transported for disposal;

- g. The person(s) who selected the location to which such material was transported for disposal;
 - h. The individuals employed with any transporter identified (including truck drivers, dispatchers, managers, etc.) with whom you dealt concerning removal or transportation of such material; and
 - i. Any billing information and documents (invoices, trip tickets, manifests, etc.) in your possession regarding arrangements made to remove or transport such material.
- 7. Identify individuals employed by Coca Cola's Philadelphia area facilities who were responsible for arranging for the removal and disposal of wastes, and individuals who were responsible for payments, payment approvals, and record keeping concerning such waste removal transactions between 1958 and 1976. Provide current or last known addresses and telephone numbers where they may be reached. If these individuals are the same person identified by your answer to Question 3, so indicate.
- 8. For every instance in which Coca Cola disposed of or treated material at Clearview or other areas of the Site, or arranged for the disposal or treatment of material at the Site, identify;
 - a. The date(s) on which such material was disposed of or treated at the Site;
 - b. The nature of such material, including the chemical content, characteristics, and physical state (i.e. liquid, solid or gas);
 - c. The annual quantity (number of loads, gallons, drums) of such material;
 - d. The specific location on the Site where such material was disposed of or treated; and
 - e. Any billing information and documents (invoices, trip tickets, manifests, etc.) in your company's possession regarding arrangements made to dispose of or treat such material at the Site.
- 9. Did Coca Cola, or any other company or individual ever spill or cause a release of any chemical, hazardous substances, and/or hazardous waste, and/or non-hazardous solid waste at Clearview? If so, identify the following:
 - a. The date(s) the spill(s)/release occurred;
 - b. The composition (i.e., chemical analysis) of the materials which were spilled/released;
 - c. The response made by you or on your behalf with respect to the spill(s)/release(s); and

- d. The packaging, transportation, final disposition of the materials which were spilled/released.
10. Did Coca Cola or any person or entity on its behalf ever conduct any environmental assessments or investigations relating to contamination at Clearview? If so, please provide all documents pertaining to such assessments or investigations.
 11. If you have any information about other parties who may have information which may assist the EPA in its investigation of Clearview, or who may be responsible for the generation of, transportation of, or release of contamination at Clearview, please provide such information. The information you provide in response to this request should include the party's name, address, telephone number, type of business, and the reasons why you believe the party may have contributed to the contamination at the Site or may have information regarding the Site.
 12. Identify the person(s) answering these questions on your behalf, including full name, mailing address, business telephone number, and relationship to the company.
 13. Provide the name, title, current address, and telephone number of the individual representing Coca Cola to whom future correspondence or telephone calls should be directed.
 14. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If the records were destroyed, provide us with the following:
 - a. Your document retention policy;
 - b. A description of how the records were/are destroyed (burned, archived, trashed, etc.) and the approximate date of destruction;
 - c. A description of the type of information that would have been contained in the documents; and
 - d. The name, job title, and most current address known to you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; and the person(s) who would have been responsible for the destruction of these documents.

Enclosure F
Interview Summary



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

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LOWER DARBY CREEK AREA SUPERFUND SITE

CONFIDENTIAL SOURCE

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INTERVIEW SUMMARY
Task Order 0001 Site 2
Lower Darby Creek Area



Prepared for:

U.S. Environmental Protection Agency
Region 3
Enforcement Support Services
Hazardous Site Cleanup Division
1650 Arch Street
Philadelphia, PA 19103

Prepared by:

Chenega Integrated Systems, LLC
4651 Salisbury Road
Quadrant 1, Suite 251
Jacksonville, FL 32256

Work Assignment Number:
Date Submitted:
Contract Number:
EPA Work Assignment Manager:
Telephone Number:
Chenega Project Manager:
Telephone Number:
Interviewer:

Task Order 0001 Site 2
January 19, 2006
EP-S3-04-01
Carlyn Winter Prisk
(215) 814-2625
Ilona Poppke
(215) 491-7286
Michael McCloskey
Tri-State Enterprise

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Interview Summary

January 19, 2006

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Name:

██████████ ("WITNESS")

██████████ B-1B

Affiliation:

Former Trash Truck Driver for Patrick Bizzari Hauling

Telephone:

██████████ (Cell Phone)

Type of Interview:

In-Person

Date of Interview:

January 17, 2006

On January 17, 2006, the WITNESS was interviewed at his residence by Michael McCloskey, Senior Investigator, of Tri-State Enterprise. The WITNESS was interviewed as part of the Potentially Responsible Party search currently being conducted under Task 0001 Site 2 the Lower Darby Creek Area Site in Delaware County, Pennsylvania (the "Site.") This interview focused on the Clearview Landfill. The WITNESS was provided with a copy of the letter of introduction, advised of the nature of the questions to be asked and that the interview was voluntary. The WITNESS stated that he is not represented by an attorney in this manner and did not want an attorney present. No other persons were present, and this interview was not tape-recorded.

During the course of this interview, the WITNESS responded to questions based on guidelines provided by the United States Environmental Protection Agency (EPA) for former employees.

The WITNESS was shown an aerial photograph of the Site. This aerial photograph was used as a reference throughout the interview. The aerial photograph used during this interview will be forwarded under separate cover.

The WITNESS was asked to explain his association with Patrick Bizzari Hauling and the Clearview Landfill.

The WITNESS stated that Patrick Bizzari Hauling was owned and operated by ██████████. The WITNESS stated that he was employed by Patrick Bizzari Hauling from approximately ██████████ to ██████████ as a trash truck driver. The WITNESS stated that in approximately ██████████ he formed ██████████ Refuse Company. The WITNESS stated that he did not dispose of waste at the Clearview Landfill after 1975.

The WITNESS explained that ██████████ and the owner of the Clearview Landfill, Ed Heller, were good friends. The WITNESS stated that from 1965 to 1975, all waste picked up by Patrick Bizzari Hauling was disposed at the Clearview Landfill.

When asked to identify the locations from which Patrick Bizzari Hauling picked up waste that was disposed of at the Clearview Landfill, the WITNESS stated that Patrick Bizzari Hauling only picked up waste at residential locations and small "mom and pop" stores. The WITNESS stated that he would identify generators whom he observed dispose of waste at the

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Interview Summary

January 19, 2006

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Clearview Landfill. He stated that he would not identify locations from which Patrick Bizzari Hauling picked up waste.

When asked to identify the names of companies whom he observed dispose of waste at the Clearview Landfill and to describe the waste from each generator, the WITNESS provided the following:

- Crown Cork and Seal: The WITNESS stated that he saw Crown Cork and Seal operate an open flat-bed truck, and he observed this company dispose of cork at the Site. The WITNESS was unable to recall the location of Crown Cork and Seal, but he believed they were located in Philadelphia.
- National Decal: The WITNESS stated that he observed National Decal dispose of plastic and paper at the Site. He indicated that National Decal operated a box truck. When asked if the waste contained glue or paint, the WITNESS stated that he does not know. The WITNESS stated that National Decal is located on Vine Street in Philadelphia.
- Coca Cola Company: The WITNESS stated that Coca Cola operated a tractor trailer and disposed of glass and a syrup type of liquid at the Site. The WITNESS could not recall the location of the Coca Cola Plant.
- City of Philadelphia: The WITNESS stated that the City of Philadelphia disposed of waste at the Site. The WITNESS stated that all municipal waste from the City of Philadelphia was disposed at the Site.
- Fels-Naptha: The WITNESS stated that this company was located on the banks of Darby Creek, just west of the Clearview Landfill. The WITNESS stated that the plant had numerous liquid spills into Darby Creek. The WITNESS stated that the Clearview Landfill dredged the Darby Creek and used the dredged dirt as a cover for the landfill.

The WITNESS stated that there were many more generators who disposed of waste at the Site, but he was unable to recall anything further at the present time.

When asked to identify the names of transporters that disposed of waste at the Clearview Landfill, the WITNESS provided the following:

- Kaut & Kaut: The WITNESS stated that this company operated numerous roll-off trucks and disposed of waste at the Clearview Landfill on a daily basis. He did not know the names of any of their customers.
- Charles Crumly (complete company name unknown): The WITNESS stated that Crumly also operated numerous roll-off trucks and disposed of waste at the Clearview Landfill on a daily basis. The WITNESS did not know the names of any of their customers.

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- Vince Carrorell (complete company name unknown): The WITNESS stated that Carrorell operated front-end loaders and roll-off trucks. The WITNESS stated that he does not know the names of any of their customers.
- Bernie's Hauling: The WITNESS stated that Bernie's Hauling owned and operated numerous lugger trucks. The WITNESS stated that he does not know the names of any of their customers.
- Bill's Container Service: The WITNESS stated that Bill's Container Service operated numerous roll-off containers. He did not know the names of any of their customers.
- Gonnelli Brothers: The WITNESS stated that this company owned and operated numerous roll-off containers. The WITNESS stated that he does not know the names of their customers.
- Hart & Hart: The WITNESS stated that Hart & Hart owned and operated numerous compacter trucks. He does not know the names of any of their customers.

The WITNESS was asked if he had any knowledge of the following transporters disposing of waste at the Clearview Landfill:

- Schiavo Brothers: The WITNESS stated that he could not recall.
- Eastern Industrial: The WITNESS stated that he could not recall.
- Maritime Waste: The WITNESS stated that he could not recall.
- Cleveland Wrecking: The WITNESS stated that he could not recall.
- Hawthorn Demolition Company: The WITNESS stated that he could not recall.
- Lawrenson: The WITNESS stated that he could not recall.
- Dintz Hauling: The WITNESS stated that he could not recall.
- Ace Hauling: The WITNESS stated that he could not recall.

The WITNESS was asked if he had any knowledge of the following generators disposing of waste at the Site or having the waste transported to the Site by a transporter:

- Philadelphia Navy Yard: The WITNESS stated that in the late 1970s, Pat DeLorenzo operated a trash transfer station on the Site. The WITNESS explained that DeLorenzo received waste from the Philadelphia Navy Yard and compacted the waste for transport to another waste disposal site. The WITNESS stated that some of this compacted waste was disposed of on top of the closed Clearview Landfill. The WITNESS stated that he had observed this activity on numerous occasions. The WITNESS would not provide any further information.
- Boeing Company: The WITNESS stated that he could not recall.
- MAB Paints: The WITNESS stated that he could not recall.
- General Electric: The WITNESS stated that he could not recall.
- Westinghouse Corporation: The WITNESS stated that he could not recall.
- ITE Company: The WITNESS stated that he could not recall.

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Interview Summary
Louis Bizzari

January 19, 2006

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- Barrett Roofing: The WITNESS stated that he could not recall.
- General Chemical: The WITNESS stated that he could not recall.
- Rohm & Haas: The WITNESS stated that he could not recall.
- Allied Signal: The WITNESS stated that he could not recall.

When asked the names of any other individuals who may have relevant knowledge of waste disposal activities at the Clearview Landfill, the WITNESS stated that the owners of the above-named trash companies would be knowledgeable. The WITNESS was unwilling to provide specific names.

The WITNESS offered that when he first started disposing of waste at the Clearview Landfill, the fill area was located on a pig farm northeast of the current Site boundaries. The WITNESS stated that he has been to the Site since EPA has begun monitoring, and he indicated that the boundaries of the Site are much farther out than they used to be. The WITNESS was unwilling to elaborate.

"I declare under penalty of perjury that the foregoing is true and correct."

Executed on _____
(Date)

Signed _____
(Name)

ENFORCEMENT CONFIDENTIAL

104(e) TRACKING UPDATESFILE USER PRISKEXT. 2625SITE NAME LOWER DARBY CREEK DATE 4/30/14PRP NAME COCA COLA CORPORATION DSN PA-3424

COMMENTS:

SDMS
LIT HOLD

Please indicate "PFE" or "CBI" on appropriate documents.

REMEDIAL ENFORCEMENT PLANNING**2c CORRESPONDENCE BY PRP**

- ☐ 104(e) Letters
- ☐ Follow-up 104(e) Letters
- ☐ 104(e) Responses

REMEDIAL ENFORCEMENT IMPLEMENTATION**4a NEGOTIATIONS/SETTLEMENTS**

- ☐ 104(e) Letters re: *De Minimis* Settlement
- ☐ Follow-up 104(e) Letters
- ☐ 104(e) Responses re: *De Minimis* Settlement

REMOVAL ENFORCEMENT PLANNING**7c CORRESPONDENCE BY PRP**

- ☐ 104(e) Letters
- ☐ Follow-up 104(e) Letters
- ☐ 104(e) Responses

☒ FILE☐ RETURN TO USER

DATE COMPLETED _____

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- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Coca Cola Corporation
Bernard Goepelt, Sr. VP and General
Counsel
1 Coca Cola Plaza, NW
Atlanta, GA 30313

2. Article Number:

(Transfer from service label)

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *Leon Massey*☐ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1?

☐ Yes

If YES, enter delivery address below:

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3. Service Type

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4. Restricted Delivery? (Extra Fee)

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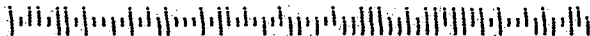
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